

PAUL HASTINGS

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September 23, 2021

The Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Al Malik Alshahhi, et al.*, 21-CR-371

Dear Judge Cogan:

On behalf of Thomas J. Barrack, Jr., a defendant in the above-captioned case, we respectfully request the Court's permission for Mr. Barrack to stay overnight in Santa Monica, California, within the Central District of California, on Sunday, September 26, 2021. The government and Pretrial Services Officers in both California and New York have consented to this request.

Mr. Barrack's Conditions of Release currently permit him to travel within the Central District of California, the District of Colorado, and the Eastern and Southern Districts of New York (Dkt. 15). Though not explicitly set out in his Conditions of Release, while in the Central District of California, per discussions with Pretrial Services, Mr. Barrack currently exclusively stays overnight at his residence in Santa Ynez, CA. With the Court's permission, Mr. Barrack would stay at 2219 La Mesa Drive, Santa Monica, CA 90402 on September 26, 2021, departing September 27, 2021. While staying overnight in Santa Monica, Mr. Barrack would continue to be subject to all other conditions of release, including his curfew, GPS monitoring, and reporting to Pretrial Services as directed.

Mr. Barrack has been fully compliant with the conditions of his pretrial supervision. He executed a bond for \$250,000,000, among other terms set out in his Conditions of Release. Mr. Barrack does not pose a flight risk.

Thank you for your consideration.

Respectfully,

/s/ Phara Serle Guberman

Phara Serle Guberman
of PAUL HASTINGS LLP

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cc: All Counsel of Record (via ECF)
Alexis Ochoa, Pretrial Services (via Email)
Manuel Ibanez, Pretrial Services (via Email)
Ramel Moore, Pretrial Services (via Email)